

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

|                     |   |                              |
|---------------------|---|------------------------------|
| THE AKRON BAIL FUND | ) | Case No. 5:23-cv-00837       |
|                     | ) |                              |
| Plaintiff           | ) | JUDGE CHARLES E. FLEMING     |
|                     | ) |                              |
| v.                  | ) | MAGISTRATE JUDGE JAMES E.    |
|                     | ) | GRIMES, JR.                  |
| CITY OF AKRON       | ) |                              |
|                     | ) | <b>NOTICE OF DEPOSITIONS</b> |
| Defendant           | ) |                              |

Pursuant to Fed. R. Civ. P. 30, Defendant City of Akron hereby provides notice that it will take the depositions of the following individuals at the dates and times set forth below. All depositions shall be taken at 172 South Broadway Street, Suite 200, Akron, Ohio 44308 before a court reporter or other officer authorized to administer oaths under federal and state law and shall continue from day to day until completed. The depositions shall be recorded by stenographic means.

- Danielle Taylor – January 22, 2024, at 9:00 a.m.
- Natalia Wyrđ – January 22, 2024, at 1:00 p.m.
- Tamara Coteat – January 23, 2024, at 9:00 a.m.
- Ryan Keen – January 24, 2024, at 9:00 a.m.
- Nicholas Cacioppo – January 25, 2024, at 9:00 a.m.
- Paul Fran Wilson – January 26, 2024, at 9:00 a.m.

In addition, Defendant City of Akron shall take the deposition of Plaintiff Akron Bail Fund pursuant to Fed. R. Civ. P. 30(b)(6) on January 25, 2024, and January 26, 2024, at 1:00 p.m. on both days pursuant to the discussion between

counsel about the likely corporate designees in order to avoid having the designees appear on multiple days. The topics of the deposition shall be those attached hereto as Exhibit A. As with the other depositions, this deposition shall be taken at 172 South Broadway Street, Suite 200, Akron, Ohio 44308 before a court reporter or other officer authorized to administer oaths under federal and state law, shall continue from day to day until completed, and shall be recorded by stenographic means.

Respectfully submitted,

Brian T. Angeloni  
Director of Law

/s/ Brian D. Bremer  
Michael J. Defibaugh – No. 0072683  
Deputy Director of Law  
John Christopher Reece – No. 0042573  
Brian D. Bremer – No. 0087363  
Kirsten L. Smith – No. 0099074  
Assistant Directors of Law  
172 S. Broadway St., Suite 200  
Akron, OH 44308  
(330) 375-2030; Fax: (330) 375-2041  
mdefibaugh@akronohio.gov  
jreece@akronohio.gov  
bbremer@akronohio.gov  
klsmith@akronohio.gov  
*Attorneys for the Defendant*

## **EXHIBIT A**

1. The founding of The Akron Bail Fund.
2. The management, organization, and decision-making process of The Akron Bail Fund.
3. The members of The Akron Bail Fund, including the process of becoming a member and obligations of members.
4. The Akron Bail Fund's fundraising and money-raising activities.
5. The operation of the Akron Bail Fund's social media accounts.
6. Akron Bail Fund's activities since its founding through the filing of the complaint in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 (the "Complaint").
7. Akron Bail Fund's activities from the date of the filing of the Complaint through the date of this deposition.
8. The expenditures of the Akron Bail Fund from its founding through the date of the Complaint.
9. The expenditures of the Akron Bail Fund from the date of the Complaint through the date of this deposition.
10. The losses, monetary and in volunteer hours, claimed by the Akron Bail Fund in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837.
11. The damages, economic or non-economic, sought by the Akron Bail Fund in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837.
12. The Akron Bail Fund's responses to the Interrogatories of the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837.

13. The Akron Bail Fund's responses to the Requests for Admission of the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837.
14. The Akron Bail Fund's response to Request for Admission No. 3 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
15. The Akron Bail Fund's response to Request for Admission No. 4 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
16. The Akron Bail Fund's response to Request for Admission No. 5 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
17. The Akron Bail Fund's response to Request for Admission No. 7 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
18. The Akron Bail Fund's response to Request for Admission No. 8 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
19. The Akron Bail Fund's response to Request for Admission No. 9 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
20. The Akron Bail Fund's response to Request for Admission No. 10 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837, the

underlying factual reasons for that response, and the membership application process for the Akron Bail Fund.

21. The Akron Bail Fund's response to Request for Admission No. 11 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837, the underlying factual reasons for that response, and the steps taken by the Akron Bail Fund to learn whether or not the Summit County Sheriff is responsible for the operation of the Summit County Jail prior to responding to the request for admission.
22. The Akron Bail Fund's response to Request for Admission No. 12 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837, the underlying factual reasons for that response, and the reports The Akron Bail Fund has made to any state, federal, or local government entities since January 1, 2022, through the date of this deposition.
23. The Akron Bail Fund's response to Request for Admission No. 13 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837, the underlying factual reasons for that response, and discussing the tax returns the Akron Bail Fund filed with any state, local, or federal government entity since January 1, 2022, through the date of this deposition.
24. The Akron Bail Fund's response to Request for Admission No. 14 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.

25. The Akron Bail Fund's response to Request for Admission No. 15 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
26. The Akron Bail Fund's response to Request for Admission No. 16 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837, the underlying factual reasons for that response, and any steps taken by The Akron Bail Fund to learn how the bail schedules for individuals arraigned in the Akron Municipal Court are established.
27. The Akron Bail Fund's response to Request for Admission No. 17 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837, the underlying factual reasons for that response, and any steps taken by The Akron Bail Fund to learn how the bail schedules for individuals arraigned in the State of Ohio are established.
28. The Akron Bail Fund's response to Interrogatory No. 1 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
29. The Akron Bail Fund's response to Interrogatory No. 3 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
30. The Akron Bail Fund's response to Interrogatory No. 4 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.

31. The Akron Bail Fund's response to Interrogatory No. 5 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
32. The Akron Bail Fund's response to Interrogatory No. 6 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
33. The Akron Bail Fund's response to Interrogatory No. 7 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
34. The Akron Bail Fund's response to Interrogatory No. 8 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
35. The Akron Bail Fund's response to Interrogatory No. 9 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
36. The Akron Bail Fund's response to Interrogatory No. 10 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
37. The Akron Bail Fund's response to Interrogatory No. 11 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.

38. The Akron Bail Fund's response to Interrogatory No. 12 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
39. The Akron Bail Fund's response to Interrogatory No. 13 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
40. The Akron Bail Fund's response to Interrogatory No. 14 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
41. The Akron Bail Fund's response to Interrogatory No. 15 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
42. The Akron Bail Fund's response to Interrogatory No. 16 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
43. The Akron Bail Fund's response to Interrogatory No. 17 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
44. The Akron Bail Fund's response to Interrogatory No. 18 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.



45. The Akron Bail Fund's response to Interrogatory No. 19 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
46. The Akron Bail Fund's response to Interrogatory No. 20 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
47. The Akron Bail Fund's response to Interrogatory No. 21 from the City of Akron in *The Akron Bail Fund v. City of Akron*, N.D. Ohio No. 5:23-cv-00837 and the underlying factual reasons for that response.
48. The allegations, statements, and conclusions set forth in the Complaint.
49. The allegations, statements, and conclusions contained in ¶ 25 of the Complaint and the basis thereof.
50. The allegations, statements, and conclusions contained in ¶ 29 of the Complaint and the basis thereof.
51. The identities of the individuals referred to in ¶ 29 of the Complaint and the specific facts surrounding their interactions with the police.
52. The allegations, statements, and conclusions contained in ¶ 30 of the Complaint and the basis thereof.
53. The identities of the individuals referred to in ¶ 30 of the Complaint and the specific facts surrounding their interactions with the police.
54. The allegations, statements, and conclusions contained in ¶ 31 of the Complaint and the basis thereof.

55. The identities of the individuals referred to in ¶ 31 of the Complaint and the specific facts surrounding their interactions with the police.
56. The allegations, statements, and conclusions contained in ¶ 32 of the Complaint and the basis thereof.
57. The identities of the individuals referred to in ¶ 32 of the Complaint and the specific facts surrounding their interactions with the police.
58. The allegations, statements, and conclusions contained in ¶ 33 of the Complaint and the basis thereof.
59. The identities of the individuals referred to in ¶ 33 of the Complaint and the specific facts surrounding their interactions with the police.
60. The allegations, statements, and conclusions contained in ¶ 34 of the Complaint and the basis thereof.
61. The allegations, statements, and conclusions contained in ¶ 35 of the Complaint and the basis thereof.
62. The allegations, statements, and conclusions contained in ¶ 36-37 of the Complaint and the basis thereof.
63. The identities of the individuals referred to in ¶ 36-37 of the Complaint and the specific facts surrounding their interactions with the police.
64. The allegations, statements, and conclusions contained in ¶ 38 of the Complaint and the basis thereof.
65. The identities of the individuals referred to in ¶ 38 of the Complaint and the specific facts surrounding their interactions with the police.

66. The Akron Bail Fund's role in the April 17, 18, and 19, 2023 gatherings referenced in ¶ 24, 36, and 39 of the Complaint.
67. Any participation of the members of The Akron Bail Fund in the April 17, 18, and 19, 2023 gatherings referenced in ¶ 24, 36, and 39 of the Complaint.
68. The allegations, statements, and conclusions contained in ¶ 43 of the Complaint and the basis thereof.
69. The allegations, statements, and conclusions contained in ¶ 44 of the Complaint and the basis thereof.
70. The allegations, statements, and conclusions contained in ¶ 45 of the Complaint and the basis thereof.
71. The identities of the individuals referred to in ¶ 45 of the Complaint and the specific facts surrounding their interactions with the police.
72. The allegations, statements, and conclusions contained in ¶ 46 of the Complaint and the basis thereof.
73. The identities of the individuals referred to in ¶ 46 of the Complaint and the specific facts surrounding their interactions with the police.
74. The allegations, statements, and conclusions contained in ¶ 47 of the Complaint and the basis thereof.
75. The identities of the individuals referred to in ¶ 47 of the Complaint and the specific facts surrounding their interactions with the police.
76. The allegations, statements, and conclusions contained in ¶ 48 of the Complaint and the basis thereof.

77. The allegations, statements, and conclusions contained in ¶ 49 of the Complaint and the basis thereof.

78. The identities of the members, volunteers, and organizers referenced in ¶ 50 of the Complaint and the specific harm alleged each suffered.

79. The allegations, statements, and conclusions contained in ¶ 54 of the Complaint and the basis thereof.

80. The identities of the individuals referred to in ¶ 54 of the Complaint.

81. The allegations, statements, and conclusions contained in ¶ 55 of the Complaint and the basis thereof.

82. The identities of the individuals referred to in ¶ 55 of the Complaint.

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing was filed electronically on January 10, 2024. Notice of this filing will be sent to all parties by operation of the Clerk of Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Brian D. Bremer  
Brian D. Bremer – No. 0087363